

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ANGELA ADKINS, on behalf of herself and all others similarly situated,  Plaintiff,  v.  EVEREST GLOBAL SERVICES, INC.,  Defendant.	Case No. 3:23-cv-00004  District Judge Michael A. Shipp Magistrate Judge Lois H. Goodman  Electronically Filed  <b>Return Date: June 5, 2023 10:00 A.M.</b>  <b>ORAL ARGUMENT REQUESTED</b>
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**DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S AMENDED  
COMPLAINT PURSUANT TO RULE 12**

**TO: Vicki Maniatis, Esq.**  
MILBERG COLEMAN BRYSON  
PHILLIPS GROSSMAN, LLC  
100 GARDEN CITY PLAZA  
SUITE 500  
GARDEN CITY, NY 11530  
Email: vmaniatis@milberg.com  
Attorneys for Plaintiff

**PLEASE TAKE NOTICE** that on June 5, 2003, at 10:00 a.m. at the Clarkson S. Fisher Federal Building and U.S. Courthouse, 402 E. State St., Trenton, NJ 08608 Defendant Everest Global Services, Inc. ("Everest") will move before the Court for an Order dismissing Plaintiff's Amended Complaint in its entirety with prejudice pursuant to Rule 12 of the Federal Rules of Civil Procedure, and awarding costs pursuant to Rule 54 of the Federal Rules of Civil Procedure.

**PLEASE TAKE FURTHER NOTICE** that Everest shall rely on Everest's Brief in Support of Motion to Dismiss Plaintiff's Amended Complaint, and the record in this action.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is included,  
and oral argument is requested.

Respectfully submitted,

Dated: May 1, 2023

CLARK HILL PLC

By: /s/ Steven M. Richman

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Steven M. Richman, Esq.  
[srichman@clarkhill.com](mailto:srichman@clarkhill.com)

210 Carnegie Center  
Suite 102  
Princeton, NJ 08540  
(609) 785-2911

One American Plaza  
600 West Broadway, Suite 500  
San Diego, CA 92101

By: Myriah V. Jaworski (*pro hac vice*  
pending)  
([mjaworski@clarkhill.com](mailto:mjaworski@clarkhill.com))

130 E Randolph St Suite 3900  
Chicago, IL 60601  
(360) 901-9086

By: Chirag H. Patel (*pro hac vice* pending)  
([cpatel@clarkhill.com](mailto:cpatel@clarkhill.com))

*Attorneys for Defendant,  
Everest Global Services, Inc*

*\*Admitted Pro hac vice*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 1, 2023, I caused the foregoing **NOTICE OF MOTION** along with the following documents:

- 1. EVEREST GLOBAL SERVICES, INC.'S BRIEF IN SUPPORT OF MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**
- 2. PROPOSED ORDER**

to be served upon all counsel of record by filing same through the CM/ECF Electronic filing system of the United States District Court for the District of New Jersey.

/s/ Steven M. Richman